

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 5:23-CR-00414
)	
Plaintiff,)	
vs.)	JUDGE BRIDGET MEEHAN
)	BRENNAN
SABRINA COLLINS,)	
)	
Defendant.)	<u>MOTION TO WITHDRAW</u>
)	<u>GUILTY PLEA</u>
)	

Defendant Sabrina Collins, through the undersigned counsel, files this Motion to Withdraw Guilty Plea. The reasons for this motion are set forth below in the attached Memorandum in Support.

Respectfully Submitted,

/s/ Joseph V. Pagano
Joseph V. Pagano (0073491)
Attorney for Defendant
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MEMORANDUM IN SUPPORT

On December 1, 2023, Ms. Collins appeared before this Honorable Court, represented by counsel, and entered a guilty plea to Count One of the indictment: Tampering with a Witness, in violation of 18 U.S.C §1512(b)(1). Ms. Collins' sentencing is scheduled for March 19, 2024.

Ms. Collins informed Counsel this week that she desired to withdraw her plea. After further thought, she has indicated to Counsel that she did not understand the defenses available to her and thus did not make a knowing and intelligent plea.

Under Fed. Crim R. 11(d)(2), a defendant can withdraw their guilty plea before sentencing if "the defendant can show a fair and just reason for requesting the withdrawal." Here, Ms. Collins' has not been sentenced and can demonstrate a misunderstanding of the defense available to her when she made the plea. Therefore, the plea was not made knowingly or intelligently. Ms. Collins respectfully requests that this Honorable Court allow her to withdraw her guilty plea.

CERTIFICATE OF SERVICE

I hereby certify that on January 18, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Joseph V. Pagano
Joseph V. Pagano
Attorney for Defendant